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VIA ECF

The Honorable  
United States Magistrate Judge  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl St.  
New York, NY 10007-1312

**MEMO ENDORSED**

***Re: Project South et al. v. U.S. Immigration and Customs Enforcement et al., 21 Civ. 8440 (ALC) (BCM)***

Dear Judge Moses:

We write as counsel for Plaintiffs Project South and Center for Constitutional Rights, in the above-referenced case filed under the Freedom of Information Act, 5 U.S.C. §§ 552 *et seq.* We respectfully request on behalf of all parties a second adjournment of the initial conference currently scheduled for February 3, 2022, at 11:00 a.m.

The parties have begun to meet and confer regarding various aspects of the Plaintiffs' FOIA requests and the agencies' questions of how to most effectively search for the records sought by Plaintiffs. The parties seek additional time to continue these good faith discussions before appearing before the Court.

Additionally, because FOIA cases typically do not involve discovery, the parties do not plan to submit a discovery schedule at this time.

We respectfully request a 30-day adjournment of the initial conference, from February 3, 2022, to March 3, 2022, or to any day thereafter convenient for the Court. We respectfully request that due to scheduling conflicts for Plaintiffs' counsel, the conference not be scheduled on a Tuesday.

We thank the Court for its consideration.

Application GRANTED. The initial case management conference will take place on **March 3, 2022, at 11:00 a.m.**, in Courtroom 20A of the Daniel Patrick Moynihan United States Courthouse. No later than **February 24, 2022**, the parties shall file their pre-conference joint statement. SO ORDERED.

Barbara Moses, U.S.M.J.  
January 27, 2022

/s/ Baher Azmy  
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*cc: Counsel of Record via ECF*